



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3rd Floor  
New York, New York 10007*

September 13, 2013

**By ECF**

The Honorable Paul A. Crotty  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Residents for Sane Trash Solutions, Inc., et al. v.  
United States Army Corps of Engineers, et al.*,  
12 Civ. 8456 (PAC)

*Kellner, et al. v. United States Army Corps of  
Engineers, et al.*, 12 Civ. 8458 (PAC)

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Dear Judge Crotty:

This Office represents defendants the United States Army Corps of Engineers and Colonel Paul E. Owen (collectively, "USACE") in the above-referenced, related matters. Currently, the schedule for the parties to cross-move for summary judgment is as follows: opening briefs due September 20, 2013; opposition briefs due November 8, 2013; and reply briefs due December 13, 2013.

Owing to the press of business, and with the consent of the parties in both matters, we write respectfully to request a one-week extension of the parties' briefing deadlines: opening briefs due September 27, 2013; opposition briefs due November 15, 2013; and reply briefs due December 20, 2013. This is USACE's first request for an extension of the briefing schedule.

We thank the Court for its consideration of this letter.

Respectfully,

PREET BHARARA  
United States Attorney for the  
Southern District of New York

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